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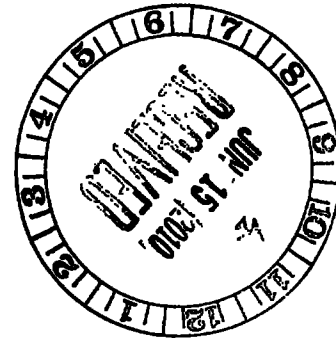
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Public Record

WILLIAM B. FERNS

TIMOTHY C. QUINNELL

June 9, 2010



Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001

Keith G. O'Brien  
2401 Pennsylvania Avenue NW, Suite 300  
Washington, DC 20037

RE: Docket No. AB 415(Sub-No.2X)  
Escanaba and Lake Superior Railroad Co. - Petition to Abandon 42.3 Miles of Rail Line  
in Ontonagon and Houghton Counties, Michigan

Dear Sirs:

I represent the Heartland Business Bank, f/k/a Wisconsin Business Bank, a branch of Wisconsin Community Bank ("Bank").

My client has a first mortgage on real estate owned by the Escanaba and Lake Superior Railroad Company ("Railroad"). The mortgage covers a substantial amount of real estate owned by the Railroad including rights of way located in various counties of Michigan along with Ontonagon and Houghton counties. The mortgage was given to secure an debt to the Bank which is currently in the amount of \$2.5 million. The Bank also has a first lien on all other assets of the Railroad.

The Railroad is substantially in default on its obligation to the Bank. Accordingly, a complaint to foreclose mortgage, for delivery of property, and for damages was filed in the Delta County Circuit Court in Escanaba Michigan on October 15, 2009, Case No.: 09-20280-CH. The Defendant filed a notice of removal to the Federal Court and Plaintiff's claim is currently pending in the United States District Court for the Western District of Michigan, Northern Division, Case No.: 2:09-cv-243. The Bank has filed a motion to remand and that motion is currently pending.

Very truly yours,  
[Signature]

By: [Signature]  
[Name]  
[Title]

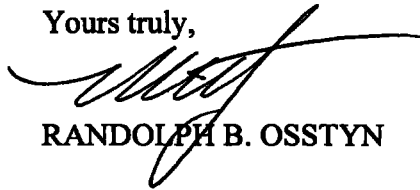
The purpose of this letter is to object to the proposed abandonment of rail line which is subject to my client's mortgage. To the extent that the rail line is a fixture and part of the real estate, it is subject to my client's mortgage. In addition, the rail line is an integral part of the operational business of the Railroad.

If it is necessary to complete the foreclosure action, then the entire Railroad would be sold at public auction to the highest bidder to satisfy the debt owed by the Railroad to the Bank. It is proposed that a potential bidder would want to purchase the Railroad operation in its entirety as an ongoing entity.

Abandonment of a portion of the Railroad right of way would reduce the value of the Railroad as an ongoing entity and therefore impair the collateral position of my client. The Railroad has more value as a going concern in its present state. Abandoning a portion of the right of way and selling assets would be detrimental to my client's position as a first mortgage lien holder.

Therefore, my client objects to the abandonment proposal and supports the position of the County of Ontonagon which also has objected to the proposed abandonment.

Yours truly,

A handwritten signature in black ink, appearing to read 'R. Osstyn', written over the printed name.

RANDOLPH B. OSSTYN

RBO/dm

cc: Robert L. Bach